

October 13, 2006

Dave Walls, Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833

Re: Proposed code changes to the adoption of the 2006 IBC into the California code of Regulations. Title 24, Part 2.

Dear Mr. Walls,

In review of the proposed documents being heard on October 16, 2006, the CALBO Access Compliance Committee is requesting that two issues be amended to Chapter 11-B. First, is Section 1133B.1.1.1.1 CBC (2001) which states as follows:

“1133B.1.1.1.1 All entrances and exterior ground-floor exit doors shall be made accessible to persons with disabilities. ...”

To be amended as follows:

1133B.1.1.1.1 All entrance doors shall be made accessible to persons with disabilities. All ground floor exit doors shall comply with the provisions of Section 1007.1. Doorways”

Reason-

If the code goes forward without this change, there will be a direct conflict between Section 1007.1 as it relates to accessible means of egress and what is currently specified in Section 1133B.1.1.1.1. Section 1007.1 requires that the minimum number of accessible means of egress is to be not less than what is required for designed exiting from any building. This means that if 3 exits are required by design then a minimum of three are required to be accessible. This will allow designs to allow more doors within a building and not required all to be accessible. This is very typical scenario for a Manufacturing or Distribution facility. Many of these facilities have many additional doors provided that is not needed other than providing an additional convenient egress from the building. Many of these doors do not provide access to any public way but only to a parking lot or vehicular driveway. Section 1133B.1.1.1.1 would require that all doors provided (not necessary required) must be accessible. The wording in 1007.1 has been needed for many years to offset costs to buildings that are required to provide accessible exits that are not being used.

The second item of concern is the exclusion of truncated domes within curb ramps. Section 1127B.5. Currently this needed code language is only mentioned in the DOJ certification version of the proposed code revisions. We at CALBO know the importance to go forward with the ICC amendment package and do not in any way stop its process. We are concerned that if the ICC adoption process does get approved and the DOJ package does not for some reason, we will be, for a long time, without provisions in the code that are necessary in preventing unreasonable hardships per frivolous law-suites. DSA/AC has recommended domes within all curb ramps for many months now and has published a recommendation in their interpretive manual but fails to include this language in the actual current code. We are recommending that the revised language currently proposed in the DOJ version of the adoption process be included

in both the ICC implementation and the DOJ code proposed amendments. This will allow code officials to finally provide consistency in implementation of this needed element for accessibility.

I want to thank your consideration on these 2 important issues.

Sincerely,

Daniel P. Larsen, Chairman
CALBO Disabled Access Review Committee.